

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's Amateur Service Rules to Eliminate Morse Code Testing)))))	RM-10787

To: The Commission

COMMENTS TO THE PETITION

I concur generally with the above referenced petition (“the Petition”) filed by the National Conference of Volunteer Examiner Coordinators (“NCVEC”) with one critical. This exception is discussed below.

On March 15, 2004, I will have held an amateur service license grant from the Federal Communications Commission for one-half century. I have held the top rank Amateur Extra Class operator license for almost 40 years.

A telegraphy skill requirement for an Amateur Extra Class operator license grant should continue.

As stated in the Petition, manual telegraphy continues to be an important communication mode in the amateur service. For some 90 years, passing a test in the international Morse code has been a fundamental requirement for an amateur operator license in the United States. The need to bring and end to a telegraphy skill requirement for the beginner Technician Plus Class operator and the intermediate level General Class operator is an issue separate from the need for telegraphy skill by an Amateur Extra Class operator. This top class of operator license recognizes the grantee as being a true expert in all phases of the amateur service. Such an expert must be able to send and receive messages in the international Morse code. A “telegraphy-challenged expert amateur operator” would be an oxymoron, indeed!

Exchanging over-the-air messages can best prove telegraphy skill.

As one of the 30,000 volunteer examiners (“VEs”), I appreciate and fully agree with the difficulty in preparing and administering the present examinations in telegraphy. Fortunately, these difficulties can be easily avoided. A more meaningful approach to proving one’s skill in telegraphy can be used. For example, §97.505(a)(6) of the Commission’s Rules, 47 CFR §97.505(a)(6), could be amended to require the administering VEs to give telegraphy skill credit to an examinee holding document(s) confirming two-way, over-the-air communications in the international Morse code with amateur stations at large or with specifically designated amateur stations. The administering details should be left to the volunteer-examiner coordinators to establish. They can best determine a testing procedure more acceptable to the VEs.

Summary

I favor terminating the telegraphy skill requirement for the Technician Plus Class and General Class operator license grant. I do not support terminating the telegraphy skill requirement for the Amateur Extra Class operator license grant. I recommend, however, deletion of the telegraphy testing procedure requirements in §97.503(a) of the Commission’s Rules, 47 CFR §97.503(a), and allowing instead the VECs to devise and implement procedures more acceptable to the administering VEs.

Respectfully submitted,

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September 1, 2003

cc: NCVEC Rules Committee